UNITED STATES DISTRICT COURT DISTRICT OF MAINE

UNITED STATES OF AMERICA

v.

DAMIEAN MARCIAL-ALEXANDER, A/K/A "MONKEYMAN", "MONKEY"; and RYAN ANSART

Crim. No.: 1:23-cr-00036-LEW

PROSECUTION VERSION

On about between April 4, 2022 and April 10, 2022, in the District of Maine and elsewhere, the defendant Damiean Marcial-Alexander knowingly and intentionally conspired with Ryan Ansart to commit an offense against the United States.

Specifically, they conspired to knowingly and unlawfully steal, take and carry away from the premises of a licensed firearms dealer, namely JR's Trading and Pawn, firearms in the licensee's business inventory that were shipped or transported in interstate or foreign commerce, specifically including, but not limited to, (1) a Glock, Model 17 Gen 5, 9mm pistol, serial number BTMW591 and (2) a Smith & Wesson. .38 special revolver, serial number 266377. On April 10, 2022, Damiean Marcial-Alexander and Ryan Ansart did, in fact, steal firearms from JR's Trading and Pawn.

On April 10, 2022 at approximately 2:25 am, surveillance footage observed two individuals, later identified as Damiean Marcial-Alexander and Ryan Ansart, break into JR's Trading and Pawn in Waterville, Maine, a licensed firearms dealer. Both individuals were wearing sweatshirts with the hoods on and masks covering their faces. According to an ATF Theft/Loss Report submitted by the store owner, 15 firearms were reported stolen, 6 revolvers and 9 semi-automatic pistols.

If this matter were to proceed to trial, the government would present text and

Instagram messages between Damiean Marcial-Alexander and Ryan Ansart. Via these messages, Damiean Marcial-Alexander and Ryan Ansart agreed to steal firearms from JR's Trading and Pawn. They agreed that Ryan Ansart would travel from his home in West Springfield, Massachusetts to Waterville, Maine so the defendants could steal firearms from JR's Trading and Pawn together. They further agreed that they would leave Damiean Marcial-Alexander's apartment in Waterville, Maine and travel on foot to JR's Trading and Pawn on the night of the robbery. They further agreed to divide up the firearms stolen from JR's Trading and Pawn.

Specifically, Damiean Marcial-Alexander and Ryan Ansart sent the following messages to each other:

- On about April 4, 2022, Damiean Marcial-Alexander sent a text message to Ryan Ansart describing a particular firearm, a Glock 17, that was in JR's Trading and Pawn inventory.
- On about April 4, 2022, Damiean Marcial-Alexander sent a text message
 to Ryan Ansart describing the security cameras in JR's Trading and Pawn.
- On about April 4, 2022, Damiean Marcial-Alexander sent an Instagram
 message to Ryan Ansart stating that he was going to JR's Trading and
 Pawn to determine which firearms they should steal.
- On about April 5, 2022, Ryan Ansart sent an Instagram message to
 Damiean Marcial-Alexander stating that "Jays" was bringing Ryan Ansart
 up to Maine on Saturday night the night before the robbery of JR's
 Trading and Pawn.
- On April 5, 2022, Damiean Marcial-Alexander sent an Instagram message to Ryan Ansart that contained a colored map describing the route between Damiean Marcial-Alexander's apartment in Waterville, Maine and JR's

Trading and Pawn. This map was intended to be used as a plan or guide for the route of travel to JR's Trading and Pawn to facilitate the robbery.

On April 8, 2022, Ryan Ansart sent an Instagram message to Damiean
 Marcial-Alexander stating that he was charging a flashlight to help them
 see during the robbery of JR's Trading and Pawn. Damiean Marcial-Alexander responded that this was "smart."

Further, photographs and videos were obtained from Ryan Ansart's phone. They show (1) pictures of the firearms stolen from JR's Trading and Pawn and (2) pictures and videos of Damiean Marcial-Alexander and Ryan Ansart holding the guns that they had stolen from JR's Trading and Pawn and pointing them at the camera.

If this matter were to proceed to trial, the government would also present evidence from an ATF interstate nexus expert stating that the firearms stolen from JR's Trading and Pawn were manufactured outside the state of Maine.

Date: May 28, 2024 Respectfully submitted.

DARCIE N. MCELWEE United States Attorney

BY: /s/ ANDREW McCORMACK Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2024, I electronically filed the Prosecution Version with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Jamesa J. Drake, Esq.

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